

Peter Kmeto
Attorney at Law
State Bar #78827
P.O. Box 8789
South Lake Tahoe, CA 96158
Office (916)444-7420; Cell: (916) 768-6636
Email: pkmeto@sbcglobal.net

Attorneys for: TINU KHANNA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

| | | |
|---------------------------|---|-----------------------|
| UNITED STATES OF AMERICA, |) | No. 2:22-CR-00213-KJM |
| |) | |
| Plaintiff, |) | STIPULATION AND |
| |) | ORDER TO MODIFY |
| |) | CONDITIONS OF |
| |) | PRETRIAL RELEASE |
| |) | |
| vs. |) | |
| |) | |
| TINU KHANNA (2), |) | |
| Defendant. |) | |

Defendant, TINU KHANNA, hereby submits a Stipulation and Proposed Order for a one-time modification of his pretrial release conditions.

Stipulation and Grounds for Modification:

Defendant was released on or about December 27, 2023. Special Conditions pertinent to this request and stipulation are as follows:

5. You must restrict your travel to the District of New Jersey and the Eastern District of California (for Court purposes) unless otherwise approved in advance by the pretrial services officer. And,

14. You must adhere to a curfew and remain inside your residence every day from 6:00pm to 6:00am, or as adjusted by the pretrial services officer for medical, religious services, employment or Court-ordered obligations.

1 To date Defendant has been in compliance with all of his Special Conditions of
2 Release, which has been verified by the office of his District of New Jersey's Pretrial
3 Office and that office has no objection to the requested one-time modification.
4

5 In celebration of Defendant's upcoming birthday, his fiancé, Ms. Krishma
6 Prashar, has traveled from England, her country of residence, to celebrate Defendant's
7 birthday with him. It is their desire to be able to celebrate in the neighboring federal
8 district, viz., the Southern District of New York, this coming August 10th through 13th.

9 The prosecutor in this case, AUSA Veronica Alegria has verified the above facts
10 and has no opposition to this one-time modification.
11

12 IT IS SO STIPULATED.

13 Dated: August 7, 2024 /s/ VERONICA ALEGRIA
14 VERONICA ALEGRIA
15 Assistant US Attorney
for the Government

16 Dated: August 7, 2024 /s/ PETER KMETO
17 PETER KMETO
18 Attorney for Defendant
19 TINU KHANNA
20
21
22
23
24
25
26
27
28

ORDER

UPON GOOD CAUSE SHOWN and the stipulation of the two parties IT IS ORDERED that Defendant TINU KHANNA's release conditions shall be modified to permit him to travel to the Southern District of New York from August 10th through August 13th. All other conditions of release shall remain the same.

Dated: August 8, 2024

_____/s/ Carolyn K. Delaney_____
The Hon. Carolyn K. Delaney
United States Magistrate Judge